

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

MONARCH NETWORKING
SOLUTIONS LLC,

Plaintiff,

v.

CISCO SYSTEMS, INC.

Defendant.

Civil Action No. 2:20-CV-00015-JRG

JURY TRIAL DEMANDED

CISCO'S NOTICE PURSUANT TO 35 U.S.C. § 282

Pursuant to 35 U.S.C. § 282, Defendant Cisco Systems, Inc. ("Cisco") hereby gives notice to Plaintiff Monarch Networking Solutions LLC ("Monarch") of the patents and publications that Cisco, to the extent allowed, may rely upon in order to anticipate, render obvious, and/or show the state of the art with respect to U.S. Patent Nos. 8,451,844 (the "'844 Patent"), 9,019,965 (the "'965 Patent"), and 8,130,775 (the "'775 Patent") (collectively the "Patents-in-Suit"). Cisco further provides notice of persons whom Cisco may rely upon as having relevant knowledge of the state of the art with respect to the Patents-in-Suit.

Cisco has previously provided Monarch with notice of these patents and publications through its pleadings, contentions, expert disclosures, briefs, document productions, discovery responses, and pre-trial disclosures. Cisco hereby incorporates those disclosures by reference. Cisco also incorporates by reference all of its papers filed or submitted in connection with its *inter partes* reviews and *ex parte* reexaminations relating to the Patents-in-Suit. Cisco further incorporates by reference the file histories of the Patents-in-Suit. To the extent that any of these

patents and/or publications were not previously produced in discovery, this Notice supplements Cisco's prior discovery responses under Federal Rule of Civil Procedure 26(e).

Cisco's listing of patents, publications, and persons in this Notice does not indicate that all, most, or any number of these patents, publications, or persons will ultimately be relied upon by Cisco at trial. Therefore, no suggestion should be taken that Cisco must rely on all of the identified patents, publications, and persons to support any of Cisco's invalidity defenses.

A. Patents And Published Applications (Country of Origin, Patent No., Inventor, Date of Issue)

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- *RFC 4213 - Basic Transition Mechanisms for IPv6 Hosts and Routers* (October 2005)

C. Knowledgeable Persons

- Dr. Kevin Jeffay c/o counsel for Cisco;
- Dr. Martin Walker c/o counsel for Monarch;
- Dr. Michael Mitzenmacher c/o counsel for Monarch;
- Mr. Ole Troan c/o counsel for Cisco;
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